

UNITED STATES DISTRICT
COURT
SOUTHERN DISTRICT OF
NEW YORK
UNITED STATES OF
AMERICA,
-against- HO WAN KWOK,
a/k/a "Miles Guo,"
a/k/a "Miles Kwok,"
a/k/a "Guo Wengui,"
a/k/a "Brother Seven,"
a/k/a "The Principal,"
KIN MING JE,
a/k/a "William Je," and
YANPING WANG,
a/k/a "Yvette,"
Defendants
Judge Analisa Torres

Case No. 1:23-CR-118-1 (AT)

Motion to Expel Luc

I will use the court documents written by the prosecutor to show complete evidence to prove that Luc is suspected of serious conspiracy. These court documents were written by the prosecutor, not other related parties. After the prosecutor sees my motion, please respond to me immediately!

Document 7

Despite this injunction, obstruction of Kwok ' s bankruptcy proceeding has continued. Two

days after the preliminary injunction was issued, on January 11, 2023, on his Gettr page, Kwok encouraged his followers to flood the bankruptcy docket with claims (regardless of their merit).

By so doing, Kwok sought to force the Trustee to incur unnecessary costs and expense as well as obstruct the proceedings.¹⁴ On January 23, 2023, Kwok posted a video on Getter in which he encouraged more of the same, and revealed the purpose of the filings was to obstruct the bankruptcy court and cause unnecessary expenses for the Trustee:

" All of you go to the bankruptcy court . . . Let the attorney ' s fees of trustee accumulate to 1 trillion if possible. "

" Think about it, \$1,860 an hour as the attorney ' s fees. How much attorney fees is

it after you all registered? How good is that! "

Document 192

Indeed, even after the Bankruptcy Court issued a preliminary injunction barring Kwok from certain obstructive activities, Kwok violated it. Specifically, Kwok encouraged his followers

to flood the bankruptcy docket with claims (regardless of their merit).

On January 23, 2023,

Kwok posted a video on Getter in which he encouraged more of the same, and revealed the purpose of the filings was to obstruct the bankruptcy court and cause unnecessary expenses for the Trustee:

"All of you go to the bankruptcy court . . . Let the attorney's fees of Trustee accumulate to 1 trillion

if possible;" and "Think about it, \$1,860 an hour as the attorney's fees. How much attorney fees

is it after you all registered? How good is that!"

Document 388

Farm Leaders

The Government further seeks to admit statements of several leaders of the Himalaya Farm Alliance: David Dai, Xia Qidong, Sara Wei, and Zhang Yongbing. There is sufficient evidence to find that each of these individuals were members of the conspiracies related to the Farms. Dai was the leader of the Farm based in the United Kingdom.

Tr. at 384:24 – 25. Xia served as the leader of the Mountain of Spices (“ MOS ”) Farm and as the

Alliance secretary. Id. at 1373:19 – 1347:8, 1387:10 – 18. Wei led the Phoenix Farm. Id. at 2500:18 – 19. And, Zhang was the “ legal group leader ” of the Mountain of Spices Farm and a member of the Iron Blood Group.⁴

Id. at 2403:3 – 15.5

Guo selected each of these individuals to lead their respective Farms and in turn, they carried out his instructions in managing the Alliance.

File 388 is a court order. In this case, each party must comply with the court order! This court order was also initiated by the prosecutor's motion in file 382, and then approved by the respected Judge Torres!

The contents of the prosecutor's file 7 and file 192 that I quoted are the creditor registration. The thousands of creditors represented by Luc are the result of the prosecutor's questioning of Guo Wengui's crime in the court documents written by the prosecutor!

Based on this complete chain of evidence, it can be deduced that the creditor registration is illegal, and I have 100% reason to suspect that Luc is suspected of serious conspiracy crimes!

Conclusion

1. I ask the judge to immediately declare that the creditor registration is illegal
2. I ask the judge to immediately expel Luc from the court for suspected serious conspiracy
3. I strongly recommend that the prosecutor immediately open a criminal investigation against Luc

Sincerely

Chunk Chyi



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